

John Paul Stanford, Esq.
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Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:
BOWIE REAL ESTATE HOLDINGS, LP
DEBTOR

**APPLICATION BY DEBTOR TO EMPLOY QUILLING, SELANDER,
LOWNDS, WINSLETT & MOSER, P.C. AS GENERAL COUNSEL**

Notice

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1100 COMMERCE STREET, ROOM 1254 DALLAS, TEXAS 75242 BEFORE CLOSE OF BUSINESS ON JUNE 3, 2020, WHICH IS AT LEAST TWENTY-FOUR DAYS FROM THE DATE OF SERVICE HEREOF.

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY
MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE
AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE
HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Bowie Real Estate Holdings, LP (“Debtor”), the debtor and debtor-in-possession, files its application to employ Quilling, Selander, Lownds, Winslett & Moser, P.C. (“QSLWM”) as general counsel (“Application”) as follows:

1. On April 6, 2020 (the Petition Date”), a voluntary petition for relief was filed by the Debtor.
2. The Debtor is in possession of its property and is managing its affairs pursuant to 11 U.S.C. §§1107 and 1108.
3. The Debtor desires to employ the law firm of QSLWM, 2001 Bryan Street, Suite 1800, Dallas, Texas 75201, as its general counsel in this case. The Debtor has selected the law firm of QSLWM because the practitioners in the firm have considerable experience in matters of this character, are admitted to practice before this Court, and are well qualified to represent the Debtor in this case. This Application is supported by the Affidavit of John Paul Stanford, which is attached hereto as Exhibit (“A”) and is fully incorporated herein.
4. The professional services which QSLWM will render include but are not limited to the following:
 - (a) to furnish legal advice to the Debtor with regard to its powers, duties and responsibilities as a debtor-in-possession and the continued management of its affairs and assets under chapter 11;
 - (b) to prepare, for and on behalf of the Debtor, all necessary applications, motions, answers, orders, reports and other legal papers;
 - (c) to prepare a disclosure statement and plan of reorganization and other services incident thereto;
 - (d) to investigate and prosecute preference and fraudulent transfers actions arising under the avoidance powers of the Bankruptcy Code; and
 - (e) to perform all other legal services for the Debtor which may be necessary herein.

5. *Except as set forth below*, to the best of the Debtor’s knowledge, the partners, counsel, and associates of QSLWM do not have any connection with the Debtor, its affiliates, creditors,

stockholders, any other party in interest, their respective attorneys or accountants, the United States Trustee, or any person employed in the office of the United States Trustee. Consequently, the Debtor believes that QSLWM represents no interest adverse to either the Debtor or the estate in the matters to which it will be engaged for the Debtor, as required by §327 of the Bankruptcy Code, and that the employment of QSLWM would serve the best interests of this estate.

6. The terms of employment of QSLWM, as agreed to by the Debtor and subject to the approval of this Court, are that certain attorneys and personnel within the firm will undertake this representation at their respective standard hourly rates charged to all other clients whether in bankruptcy or non-bankruptcy related matters. The Debtor has been informed that the normal hourly billing rates of QSLWM range from \$300.00 to \$425.00 per hour for shareholders and \$225.00 to \$275.00 per hour for associates. The rates for paralegals range from \$75.00 to \$140.00 per hour. The hourly rates charged by QSLWM are subject to periodic adjustments to reflect changing economic conditions and the increasing experience and expertise of its attorneys and personnel in the area of bankruptcy law. QSLWM has agreed to submit to the Debtor, on a monthly basis, a computerized billing report which will show the time expended on a daily basis by each attorney and legal assistant, together with such person's hourly billing rate and a description of the services rendered on behalf of the Debtor. It is contemplated that QSLWM will seek compensation from the Debtor's estate based upon its normal hourly billing rates. It is further contemplated that QSLWM will seek interim compensation during the case as permitted by 11 U.S.C. §331.

7. QSLWM received an initial retainer of \$10,000.00 from the Debtor. Prior to the filing of this case, QSLWM was paid \$1,357.00 for services rendered pre-petition. Also, \$1,717.00 of the initial retainer was used for the filing fee to initiate the Debtor's chapter 11 case. The balance of the retainer, \$6,926.00 will be held in trust as security against post-petition fees and expenses, as approved by orders of the Court.

8. It is in the best interests of the Debtor and the Debtor's bankruptcy estate that QSLWM be retained as bankruptcy counsel. The Debtor is satisfied that QSLWM represents no person or entity having an adverse interest to its estate or creditors in this case and that QSLWM is disinterested.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an order approving the Debtor's employment of Quilling, Selander, Lownds, Winslett & Moser, P.C. as general counsel for the Debtor under the terms specified hereinabove, together with such other and further relief to which the Debtor may be justly entitled.

DATED: April 10, 2020.

By: /s/ Faraz Hashmi
Faraz Hashmi
Managing Member , Bowie Real Estate Holding
GP, LLC, the general partner of the Debtor

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
(214) 871-2100 (Telephone)
(214) 871-2111 (Fax)

By: /s/ John Paul Stanford
John Paul Stanford
State Bar No. 19037350

PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2020, a true and correct copy of the foregoing document was served via ECF electronic filing and/or U.S. first-class mail, postage prepaid, on the United States Trustee at 1100 Commerce Street, Room 9C60, Dallas, Texas 75242, to the twenty largest unsecured creditors and to all parties requesting notice.

/s/ John Paul Stanford